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12 Attorneys for Plaintiff

13 UNITED STATES DISTRICT COURT  
 14 NORTHERN DISTRICT OF CALIFORNIA  
 15 OAKLAND DIVISION

16 UNITED STATES OF AMERICA,	)	No. CR-07-0811 SBA
17 Plaintiff,	)	JOINT MOTION TO SET STATUS
18 v.	)	HEARING DATE ON APRIL 8, 2008 AND
19 DALE PATRICK GRABMAN,	)	TO EXCLUDE TIME UNDER THE
20 Defendant.	)	SPEEDY TRIAL ACT
21	)	Date: April 8, 2008
22	)	Time: 9:00 a.m.
23	)	Court: Hon. Saundra B. Armstrong

24 The parties jointly request that this Court set a status hearing in this matter on April 8,  
 25 2008 at 9:00 a.m. and that the Court exclude time under the Speedy Trial Act between the date of  
 26 this motion and April 8, 2008.

27 On January 3, 2008, at the initial appearance in the above-captioned matter, the  
 28 Honorable Wayne D. Brazil excluded time, pursuant to the Speedy Trial Act, between January 3,  
 29 2008 and February 1, 2008 to allow for the effective preparation of counsel, as defense counsel  
 30 requested certain discovery from the government and needs time to review that discovery. Judge  
 31 Brazil set for a status hearing on February 1, 2008 before the Honorable Martin J. Jenkins. On  
 32 January 31, 2008, Judge Jenkins vacated the status hearing. On February 15, 2008, the Clerk of  
 33 the Court reassigned this matter to the Honorable Saundra B. Armstrong.

JOINT MOTION TO SET STATUS HEARING ON APRIL 8, 2008 AND TO EXCLUDE TIME  
 No. CR-07-0811 SBA

1       The parties hereby jointly request that the Court exclude time between the date of this  
2 motion and April 8, 2008 under the Speedy Trial Act for the reasons stated above and pursuant to  
3 18 U.S.C. § 3161(h)(8)(B)(iv). The discovery in this matter includes large amounts of sensitive  
4 electronic discovery requiring coordination between both counsel and the relevant investigative  
5 agency. The parties agree the ends of justice served by granting the request outweigh the best  
6 interests of the public and the defendant in a speedy trial. Undersigned defense counsel  
7 represents that he has spoken with his client, Mr. Grabman, and that Mr. Grabman agrees to this  
8 request.

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10 DATED: February 26, 2008

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13 WADE M. RHYNE  
14 Assistant United States Attorney  
Counsel for United States

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25 MICHAEL P. SEMANSKY  
Counsel for Dale Patrick Grabman

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MICHAEL P. SEMANSKY  
Counsel for Dale Patrick Grabman

JOINT MOTION TO SET STATUS HEARING ON APRIL 8, 2008 AND TO EXCLUDE TIME  
No. CR-07-0811 SBA